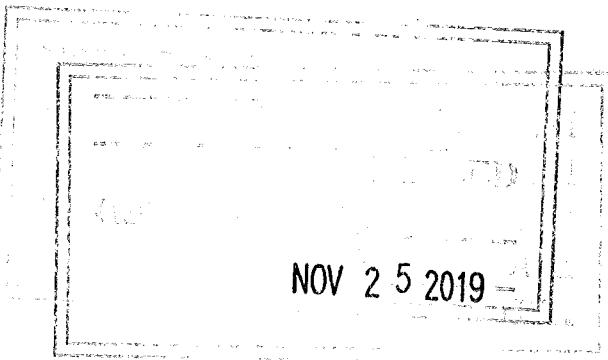


BRAIN INJURY RIGHTS GROUP, LTD.
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November 22, 2019

VIA ECF

Hon. Alison J. Nathan, U.S.D.J.
United States District Court
Southern District of New York
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, N.Y. 10007



Re: Abrams, et al. v. Carranza, et al., 19 CV 4175 (AJN)

Dear Judge Nathan:

I am counsel for Plaintiffs in the above-referenced action. On behalf of Plaintiffs, I write to respectfully request a modification of the briefing scheduling concerning Plaintiffs' motion for attorneys' fees and costs, currently due the day after Thanksgiving, November 29, 2019. Specifically, Plaintiffs request that the briefing schedule be adjusted to: 1) Plaintiffs' motion due December 20, 2019; 2) Defendant's opposition due January 10, 2020; and 3) Plaintiffs' reply due January 17, 2020. Defendant New York City Department of Education ("DOE") consents to the application. *SO ORDERED*

As the Court is aware, on October 28, 2019, the Court set forth a briefing schedule for Plaintiffs' motion for attorneys' fees and costs that set a deadline of November 29, 2019 for Plaintiffs' time to file their moving papers. ECF No. 46. Since that time, Plaintiffs have provided documentation supporting their settlement demand to DOE, which has not yet made an offer of settlement in response to that demand. Instead, on November 14, 2019, DOE filed a pre-motion conference application concerning its intent to move to dismiss the action on mootness grounds. ECF No. 47. By order dated November 20, 2019, the Court denied DOE's application. ECF No. 49.

Given the recent denial of DOE's pre-motion application, Plaintiffs expect that negotiations will now commence with an offer of settlement from DOE.

In light of the foregoing, and in light of recent, unanticipated personal and professional commitments, Plaintiffs request that the Court grant the instant application.

SO ORDERED:

11/22/19
HON. ALISON J. NATHAN
UNITED STATES DISTRICT JUDGE

Plaintiffs thank the Court for its time and consideration.

Respectfully Submitted,

/S

Karl J. Ashanti

cc: Martin Bowe, Esq. (via ECF)
Alexander Kelbush, Esq. (via ECF)
Andrey Strutinskiy, Esq. (via ECF)